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7 Attorney for Ronald Adams

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RONALD LAVELL ADAMS,

15 Defendant.  
16

Case No. 2:17-CR-332-JAD-PAL

**STIPULATION TO CONTINUE**  
**MOTION DEADLINES**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United  
18 States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Margaret W.  
20 Lambrose, Assistant Federal Public Defender, counsel for Ronald Lavell Adams, that the  
21 pretrial motion deadline be continued thirty (30) days.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
23 shall have to and including September 3, 2018, to file any and all pretrial motions and notice of  
24 defense, currently due August 2, 2018.  
25  
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including September 17, 2018, to file any and all responsive pleadings,  
3 currently due August 16, 2018.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
5 shall have to and including September 24, 2018, to file any and all replies to dispositive motions,  
6 currently due August 23, 2018.

7 1. Defense counsel is waiting on additional discovery from the government. Thus,  
8 defense counsel needs additional time to conduct investigation in this case in order to determine  
9 whether there are any pretrial issues that must be litigated and whether the case will ultimately  
10 go to trial or will be resolved through negotiations.

11 2. The defendant is incarcerated and does not object to the continuance.

12 3. The parties agree to the continuance.

13 4. The additional time requested herein is not sought for purposes of delay, but  
14 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
15 complete investigation of the discovery materials provided.

16 5. Additionally, denial of this request for continuance could result in a miscarriage  
17 of justice.

18 This is the second stipulation to continue filed herein.

19 DATED this 3rd day of August, 2018.

20 RENE L. VALLADARES  
21 Federal Public Defender

DAYLE ELIESON  
United States Attorney

22 By /s/ Margaret W. Lambrose  
23 MARGARET W. LAMBROSE  
24 Assistant Federal Public Defender

By /s/ Elham Roohani  
ELHAM ROOHANI  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3  
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 RONALD LAVELL ADAMS,

8 Defendant.

Case No. 2:17-CR-332-JAD-PAL

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. Defense counsel is waiting on additional discovery from the government. Thus,  
14 defense counsel needs additional time to conduct investigation in this case in order to determine  
15 whether there are any pretrial issues that must be litigated and whether the case will ultimately  
16 go to trial or will be resolved through negotiations.

17 2. The defendant is incarcerated and does not object to the continuance.

18 3. The parties agree to the continuance.

19 4. The additional time requested herein is not sought for purposes of delay, but  
20 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
21 complete investigation of the discovery materials provided.

22 5. Additionally, denial of this request for continuance could result in a miscarriage  
23 of justice.

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IT IS FURTHER ORDERED that the parties shall have to and including September 17, 2018 to file any all responses.

DATED: 8/7/2018.  
Nunc pro tunc: 8/2/2018

UNITED STATES DISTRICT JUDGE